

AO 91 (Rev. 08/09) Criminal Complaint

Southern District of Texas
FILED

OCT 25 2014

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

Clerk of Court

United States of America

v.

Bianca Yesenia Santoyo-Robledo

YOB: 1993

Citizenship: Mexico

Case No. m-14-2067-MJ

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 24, 2014 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21USC841 & 21USC952

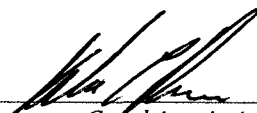
defendant did knowingly and intentionally possess with the intent to distribute approximately 6.26 kilograms of methamphetamine, a Schedule II controlled substance and did knowingly and intentionally import into the United States from the United Mexican States approximately 6.26 kilograms of methamphetamine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

On October 24, 2014, a silver 2004 Chrysler Sebring, displaying Tamaulipas Mexican license plate; 235-TPN-7, entered the United States from the United Mexican States at the Anzalduas Port of Entry in Mission, Texas. The vehicle was driven by Bianca Yesenia SANTOYO-Robledo, herein referred to as SANTOYO. At primary inspection, Customs and Border Protection Officer (CBPO), M. Espinoza received a negative declaration from SANTOYO.

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.



Complainant's signature

Andrew Bowman, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/25/2014

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Dorina Ramos

Printed name and title

Attachment "A"

SANTOYO had a database record indicating her possible involvement in narcotics smuggling. SANTOYO and her vehicle were referred to secondary inspection.

At secondary, CBPO E. Elvira received another negative declaration from SANTOYO. CBPO Elvira referred the vehicle for a Z-Portal x-ray scan. Anomalies were found in the rear seat area. CBPO Elvira and CBPO N. Hinojosa inspected the rear seat area and noticed signs of tampering, fresh paint marks, and the smell of fresh glue. The area was probed and a white substance was discovered. The substance field tested positive for methamphetamine. Once the area was opened, a total of four (4) packages that contained ten (10) smaller bundles were removed. All ten (10) packages were probed and the contents field tested positive for methamphetamine. All packages were weighed together and weighed approximately 6.26 kilograms

A short time later, Homeland Security Investigations (HSI) Special Agent (SA) Andrew Bowman and SA Anson Luna arrived at the port of entry. SA Bowman noticed the vehicle to be very clean and free of personal belongings, except the trunk had numerous personal belongings, primarily clothing and toys for a young child. SA Bowman and SA Luna interviewed SANTOYO, who was read her Miranda rights from a pre-printed form in Spanish. SANTOYO stated she understood her rights and wanted to waive her rights to answer questions. SA Luna primarily communicated with SANTOYO, since she only spoke Spanish. All communication between SA Bowman and SANTOYO were translated by SA Luna. SANTOYO provided the following details:

SANTOYO initially lied about the vehicle ownership and the purpose of her visit to the United States. Eventually, SANTOYO

stated a couple of months ago, she met a male in Mexico that needed young girls to drive vehicles into United States that had narcotics and later return to Mexico with currency. SANTOYO stated the male registered a Chevrolet Equinox in her name and she drove it numerous times into the United States to develop a "crossing history". She stated that she didn't believe she was ever carrying drugs or money during those trips. About a month ago, she said the Equinox was registered to another young person and on October 11, 2014, that vehicle and individual were stopped at the Pharr, Texas Port of Entry and marijuana was discovered in the tires. After the Equinox was taken out of her name, the male registered this Chrysler Sebring in her name. She stated she again drove it into the United States several times to develop a "crossing history". She stated she was never paid for those trips, except a little bit of spending money. On today's date, the male told her she was going to cross the vehicle again and this time she would drop the vehicle off to someone and later pick it up. She said she would be paid \$1000.00 USD upon returning to Mexico. The male told her to grab several personal belongings to put in the vehicle to make it look like it is her vehicle. The children's belongings found in the trunk were the belongings she placed in the vehicle. SANTOYO stated she didn't know she had narcotics in the vehicle and she thought she was just going to pick up currency and transport it back to Mexico.